

## **ARCA ASBESTOS LABOUR FEEDBACK APP (ALFA) PRIVACY POLICY**

Your privacy is very important to us. We promise to respect and protect your personal data and try to make sure that your details are accurate and kept up to date. This Privacy Policy sets out details of the information that we may collect from you in connection with our Asbestos Labour Feedback App (ALFA) and how we may use that information. Please take your time to read this Privacy Policy carefully. This Privacy Policy should be read alongside the terms and conditions applicable to you.

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## 1. About ARCA ►

In this Privacy Policy, references to "we" or "us" or "ARCA" are to the Asbestos Removal Contractors Association Limited. We are the leading trade association in the field of asbestos management services.

Information on how the Asbestos Labour Feedback App (ALFA) (the "App") uses your personal data can be found at <https://www.alfa.reviews/alfa-privacy-policy>. This information also includes how ALFA uses your personal data and your rights as a data subject.

Data will be collected and recorded through the App (including any updates, new versions or new releases of the App downloaded by you) and provided to us. We are a 'controller' of this data and responsible for complying with data protection laws.

If you have any questions about how we collect, store or use your personal data, you may contact us using the details provided in the 'Help and Support' section.

## 2. ALFA Agency System - Our processing of your personal data ►

We are dedicated to promoting safety and professionalism throughout the licensed asbestos removal industry. One of the ways we will do this is by giving a voice (through the App) to licensed asbestos removal contractors to rate and review the performance of labour agency operatives ("Operatives") to help drive up standards of work.

We will process personal data collected from the App on the legal ground of pursuing our **legitimate interests** to:

- promote safety and professionalism throughout the licensed asbestos removal industry;
- promote compliance with asbestos removal related legislation and regulation;
- review and monitor the standard of work, qualifications and certifications of individual Operatives;
- review and monitor trends across the Operative workforce in relation to standards of safety and quality of work;
- ensure secure and efficient operation of the App;

Only registered users from within the asbestos removal industry will be able to access the App and we will collect personal data about these registered users. The personal data that we collect will depend upon whether you are an Operative, a labour agency ("Agency") user (which includes its directors, officers, employees and agents) or a licensed asbestos removal contractor ("LARC") user (which includes its directors, officers, employees and agents). Please click on the relevant section that applies to you.

### 2.1 Labour Agency Operative

This section details what personal data we collect about you and use in relation to your role as an Operative.

#### What personal data will we collect? ►

- Photograph
- Name
- Unique identifying number that we allocate to you (NINo)
- Email Address

- Home Postcode
- Information about your current certifications and their expiry dates including your CSCS card, ori-nasal respirator test and full face respirator tests
- Your asbestos medical review dates
- Information about relevant training courses you have undertaken including the course, the training provider and dates of the training
- Details of the Agencies to which you are linked
- Information about assignments you have undertaken including the name of the LARC, the location of the assignment and date(s) of the assignment
- Feedback on your assignments from LARCs including a rating (on a scale of 1 to 6) against the following criteria: use of personal and respiratory protective equipment; set up; controls; waste handling; decontamination; teamwork & communication; attitude; time-keeping; presentation and overall impression. A copy of the questions put to the LARC following the completion of assignment are available in the FAQ section of the APP.
- Statistics about the ratings submitted about you including your average rating and the number of ratings submitted

For the avoidance of doubt, we do not process any special categories of personal data such as health information, ethnicity, trade union membership etc

### **How will we collect your personal data? ►**

We will collect information directly from you:

- when you are registered on the App by an Agency

We will also collect information from:

- any LARC for whom you have undertaken an assignment
- any Agency who places you on an assignment

### **Who will we share your personal data with? ►**

The following 'profile' will be visible to the agencies you are registered with and the LARCs you are assigned to.

- Photo
- Name
- NINo
- Home Postcode and/or distance from user's current/selected location
- Average rating based on ratings within the last 12 months or the last [5] ratings if fewer than 5 ratings have been provided in the last 12 months; if fewer than [5] ratings have been provided in total no rating will be displayed
- Number of ratings in the last 12 months
- Traffic light system in relation to the expiry of your Asbestos Training, Training, Face Fit and Medical certificates (Red = expired; Amber = expiry within 30 days; Green = valid/expiry in over 30 days)
- List of certificates available to view and download where the agency with which you are registered has requested this service

The following information will be visible to registered Agency users in addition to your profile:

- The individual ratings and feedback provided on any of your assignments placed by that Agency

The following information will be visible to registered LARC users in addition to your profile:

- The individual ratings and feedback provided on any assignment you have previously undertaken for that LARC

In addition to your public profile, we may also share your personal data with other parties in limited circumstances. In particular, our external IT solutions provider will host the App,

provide technical support and undertake any maintenance on the App. In providing these services, this third party may process your personal data but such processing will be subject to the terms of a written agreement with us which includes appropriate security measures to protect your personal data in line with this Privacy Notice and our obligations. Our IT provider will only be permitted to process your personal data on our instructions for the purposes which we have identified, and not for their own purposes, and they are not permitted to further use or share the information without our express permission.

If you would like further information regarding the disclosures of your personal data, please see the 'Help and Support' section below for our contact details.

## **2.2 Labour Agency User**

This section will detail what personal data we collect about you and use in relation to your role as the principal or delegated user of a labour agency.

### **What personal data will we collect? ►**

- Agency name
- Agency address and phone number
- Any feedback the Agency provides on the App or the information shared on it
- Any information the Agency provides to ARCA about Operatives
- Principal user
- Escalation user
- List of Delegated users
- User contact details including phone and email
- List of Operatives linked to the Agency
- Details of Assignments created by the Agency and placed with Operatives

### **How will we collect your personal data? ►**

We will principally collect information directly from you:

- when you are registered on the App through your account
- when you activate, amend and delete your list of linked Operatives
- when you activate, amend and delete assignments

### **Who will we share your personal data with? ►**

The following 'profile' may be visible to LARCs with whom you have placed operatives with and to the operatives registered with an agency:

- Agency name
- Contact names
- Email address
- Office Telephone Number
- Mobile telephone number

We will also share information you provide about assignments and your contact details with the LARC whose assignment it is and with any Operatives you propose or place the assignment with.

In addition to your public profile, we may also share your personal data with other parties in limited circumstances. In particular, our external IT solutions provider will host the App, provide technical support and undertake any maintenance on the App. In providing these services, this third party may process your personal data but such processing will be subject to the terms of a written agreement with us which includes appropriate security measures to protect your personal data in line with this Privacy Notice and our obligations. Our IT

provider will only be permitted to process your personal data on our instructions for the purposes which we have identified, and not for their own purposes, and they are not permitted to further use or share the information without our express permission.

If you would like further information regarding the disclosures of your personal data, please see the 'Help and Support' section below for our contact details.

### **2.3 LARC User [ALFA Agency System]**

This section details what personal data we collect about you and use in relation to your role as the principal, delegated, or escalation user of a LARC.

#### **What personal data will we collect? ►**

- LARC name
- LARC address and phone number
- Principal user
- List of delegated users
- Escalation user
- User contact details including phone and email
- Site contact for each assignment
- Feedback on Operatives who undertake an assignment for you including a rating (on a scale of 1 to 6) against the following criteria: use personal and respiratory protective equipment; set up; controls; waste handling; decontamination; teamwork & communication; attitude; time-keeping; presentation and overall impression.

#### **How will we collect your personal data? ►**

We will principally collect information directly from the business and you, that is:

- when you are registered on the App through your account
- when you complete information about an assignment including your feedback on the Operative who undertook the assignment

#### **Who will we share your personal data with? ►**

The following 'profile' may be visible to Agencies who have assigned operatives to your jobs

- Company name
- Contact names
- Email address
- Office Telephone
- Mobile Telephone

We will also share information you provide about assignments (including any feedback you provide on an Operative) with the Operative who undertook the assignment and the Agency that placed the Operative. Your feedback will also be aggregated in order to produce an average rating for the Operative which will be displayed to all registered users subject to the Operative having received at least [5] ratings.

In addition to your public profile, we may also share your personal data with other parties in limited circumstances. In particular, our external IT solutions provider will host the App, provide technical support and undertake any maintenance on the App. In providing these services, this third party may process your personal data but such processing will be subject to the terms of a written agreement with us which includes appropriate security measures to protect your personal data in line with this Privacy Notice and our obligations. Our IT provider will only be permitted to process your personal data on our instructions for the

purposes which we have identified, and not for their own purposes, and they are not permitted to further use or share the information without our express permission.

If you would like further information regarding the disclosures of your personal data, please see the 'Help and Support' section below for our contact details.

### **3. ALFA LARC Employees System - Our processing of your personal data ►**

The ALFA LARC Employees System is to enable LARCs to rate the performance of Employed Operatives to provide a Training Needs Analysis (TNA) to support their internal training and development programmes.

Only registered users from within the asbestos removal industry will be able to access the App and we will collect personal data about these registered users. The personal data that we collect will depend upon whether you are an **“Employed Operative”**, or licensed asbestos removal contractor (**“LARC”**) user (which includes its directors, officers, employees and agents). Please click on the relevant section that applies to you.

#### **3.1. LARC User**

This section details what personal data we collect about you and use in relation to your role as the principal, delegated, or escalation user of a LARC.

#### **What personal data will we collect? ►**

- LARC name
- LARC address and phone number
- Principal user
- List of delegated users
- Escalation user
- User contact details including phone and email
- Site contact
- Action/training contact
- Feedback on Employed Operatives including a rating (on a scale of 1 to 6) against the following criteria: use personal and respiratory protective equipment; set up; controls; waste handling; decontamination; teamwork & communication; attitude; time-keeping; presentation and overall impression. Also, additional feedback/comments if given and what actions (e.g. training) may be required.

#### **How will we collect your personal data? ►**

We will principally collect information directly from the business and you, that is:

- when you are registered on the App through your account
- when you complete information including your feedback on an Employed Operative

#### **Who will we share your personal data with? ►**

The following 'profile' may be visible to the LARC's users

- Company name
- Contact names
- Email address
- Office Telephone
- Mobile Telephone

We will also share information you provide, including any feedback on an Operative.

Your feedback will also be aggregated in order to produce an average rating for the Operative which will be displayed to all registered users subject to the Operative having received at least [2] ratings.

In addition to your public profile, we may also share your personal data with other parties in limited circumstances. In particular, our external IT solutions provider will host the App, provide technical support and undertake any maintenance on the App. In providing these services, this third party may process your personal data but such processing will be subject to the terms of a written agreement with us which includes appropriate security measures to protect your personal data in line with this Privacy Notice and our obligations. Our IT provider will only be permitted to process your personal data on our instructions for the purposes which we have identified, and not for their own purposes, and they are not permitted to further use or share the information without our express permission.

If you would like further information regarding the disclosures of your personal data, please see the 'Help and Support' section below for our contact details.

### **3.2. Employed Operative**

This section details what personal data we collect about you and use in relation to your role as an Employed Operative.

#### **What personal data will we collect? ►**

- Photograph
- Name
- Unique identifying number (NINo)
- Email Address
- Phone
- Information about your current certifications and their expiry dates for example
  - CSCS card, ori-nasal respirator test and full face respirator tests
  - asbestos medical review dates
  - information about relevant training courses you have undertaken, including the course, the training provider and dates of the training
- Feedback from Employer including a rating (on a scale of 1 to 6) against the following criteria: use of personal and respiratory protective equipment; set up; controls; waste handling; decontamination; teamwork & communication; attitude; time-keeping; presentation and overall impression.
- Feedback on any actions required following a rating e.g. refresher training
- Statistics about the ratings submitted about you, including your average rating and the number of ratings submitted.

For the avoidance of doubt, we do not process any special categories of personal data such as health information, ethnicity, trade union membership, etc

#### **How will we collect your personal data? ►**

We will collect information directly from your Employer and when you register on the App. We will also collect information from your Employer's users when rating/feedback is submitted.

## **Who will we share your personal data with? ►**

The following 'profile' will be visible to the LARC's users:

- Photo
- Name
- NI No
- Phone
- Average rating based on ratings within the last 12 months or the last [2] ratings if fewer than 2 ratings have been provided in the last 12 months; if fewer than [2] ratings have been provided in total no rating will be displayed
- Number of ratings submitted in the last 12 months
- Traffic light system in relation to the expiry of your certificates inputted into ALFA (Red = expired; Amber = expiry within 30 days; Green = valid/expiry in over 30 days)
- List of certificates available to view and download if Employer has inputted

The following information will be visible to LARC users in addition to your profile:

- Individual ratings and feedback provided

In addition to your public profile, we may also share your personal data with other parties in limited circumstances. In particular, our external IT solutions provider will host the App, provide technical support and undertake any maintenance on the App. In providing these services, this third party may process your personal data but such processing will be subject to the terms of a written agreement with us which includes appropriate security measures to protect your personal data in line with this Privacy Notice and our obligations. Our IT provider will only be permitted to process your personal data on our instructions for the purposes which we have identified, and not for their own purposes, and they are not permitted to further use or share the information without our express permission.

If you would like further information regarding the disclosures of your personal data, please see the 'Help and Support' section below for our contact details.

## **4 How do we protect your personal data when sending it abroad? ►**

Information collected and processed by ARCA is stored in the UK and is not transferred out of the European Economic Area. In the event this changes, we will notify you.

## **5 What marketing activities do we carry out? ►**

We do not perform any marketing activities that use your personal data collected via the App.

## **6 Automated processing ►**

You will not be subject to decisions based solely on automated data processing without your prior consent.

## **7 How long do we keep personal data for? ►**

We only keep your personal data for as long as reasonably necessary to fulfil the purposes set out in section 2 above. This will typically be for no longer than 18 months after your account has been deactivated. However, this period is subject to some exceptions where we have a legal requirement or compelling business reason to keep your personal data for longer.

We may anonymise your profile so that it can no longer be associated with you. We reserve the right to retain and use such anonymised data for any legitimate business purpose without further notice to you.



For further information regarding how long your personal data will be kept, please our contact details in see the 'Help and Support' section.

## **8 Cookie Policy ►**

A cookie is a small piece of data sent from a website and stored in the user's web browser while the user is browsing. Cookies were designed to be a reliable mechanism for websites to remember information or to record the user's browsing activity (clicking particular buttons, recording which pages were visited in the past).

Like a lot of websites today, this website uses cookies as part of the Member Login process, that is, if the 'remember me' checkbox is ticked a cookie will be saved on to the Members device to store their login details.

When you access the Site, some information in the form of a "cookie" or similar file may be automatically downloaded to your computer. This helps us to enhance the on-line experience of visitors to the Site. If you do not want cookies sent to or stored on your system, most Internet browsers will allow you to delete or block cookies from your computer hard drive, prevent them from being stored or signal a warning before a cookie is stored. You should refer to your browser instructions or help screen to learn more about these functions. However, please note that if you use your browser settings to delete or block cookies you may not be to access all or parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit the Site

The Site uses cookies although personally identifiable information is not stored. The following cookies are used:

- ASPSESSION\*: is a non-persistent cookie which identifies a specific user's session and expires when the user leaves the site.
- CookieControl: is a persistent cookie which is used to remember the user's preferences in regards to cookies.

We may use navigational data for system administration and to report aggregate information to our advertisers or other stakeholders. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. This means that your session may be tracked, but you will not be identified. We may use cookies to track the pages that you visit on the Site and to ensure that you do not see the same information repeatedly. We may also collect non-personal information, such as number of Site visits and tracking patterns of page viewing, to monitor the performance of the Site and make improvements to it.

## **9 Your rights ►**

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format. You have a separate right of access to your personal data processed by us. You may be asked for information to confirm your identity and/or to assist us to locate the data you are seeking as part of our response to your request.

If you have any questions about these rights or would like to exercise any of these rights, please contact us using the details set out in the 'Help and Support' section.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Information Commissioner's Office (ICO) by going to the ICO's website:

<https://ico.org.uk/concerns/> or contacting the ICO on 0303 123 1113 or [casework@ico.org.uk](mailto:casework@ico.org.uk).

## **10 How we protect your information ►**

We endeavour to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal data collected and processed via the App. These safeguards are designed to prevent your personal data from loss and unauthorised access, collection, use, disclosure, copying, modification, disposal or destruction. Unfortunately, we cannot guarantee complete security.

The security of your personal data is important to us, please advise us immediately of any incident involving the loss of or unauthorised access to or disclosure of personal data that is in our custody or control.

## **11 Contact us ►**

You may contact us if you have any questions about how we collect, store or use your personal data by contacting us using the facility in the App.

## **12 Updates to this Privacy Policy ►**

We review this Privacy Policy regularly. Occasionally we may need to make changes or additions to this policy that may affect how we handle your data. We will post new versions of this on our App. We may also notify you of changes to this Privacy Policy by email.

This Privacy Policy was last updated on: **[APRIL 2022]**